

GAF Corporation **Building Products Division** 9215 Riverview Drive St. Louis, Missourl 63137

Telephone (314) 867-3150



February 9, 1976

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

United States Environmental Protection Agency Region VII - 1735 Baltimore Kansas City, Missouri 66108

Attention: Earl J. Stephenson, Director Division Of Enforcement

Dear Sir:

As explained in my phone conversation with your office on February 6th, attached is a copy of letter dated January 9, 1976 with completed EPA Forms 7600-1, submitted by Hr. N. J. Hollowsy in our Corporate Environmental Engineering Department at Wayne, New Jersey.

We believe Mr. Holloway's letter and attachments supply the information requested in your certified letter with attachments dated February 5, 1976, which we are returning herewith as suggested by your effice.

Very truly yours.

GAT CORPORATION

3. Robert Reed

G. Robert Reed (Mass.) St. Louis, No. Plant Engineer

GRR:

Incs.

cc to Mr. G. Herminghaus - GAF St. Louis Plant Manager

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Superfund

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RECEIVED

FEB 1 0 1976

ENFC. DIV. EPA, KCMO

Junuary 9, 1976

Attention Air Compliance Branch
Enforcement Division

Reference: CAF Corporation.
9215 Riverview Drive
St. Louis, Missouri 63137

Gentlemenr

Enclosed are completed EPA Forms 7300-1 reporting the generation, handling and disposal of asbestos-containing manufacturing wastes. Part B was submitted on June 29, 1973.

Very truly yours,

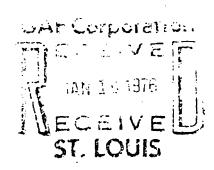
rg ...

H. J. Holloway 🌸

Attach®

bc: Borger*; Bien, Dent, Faneul, Fitzwilliams, Gutzwillers, Hemminghauss, CEED Files

bc: Mr. Reed



NATIONAL EMISSION STANDARDS FOR HAZARDOUS ARE POLLUTANTS 4. COMPLIANCE STATUS INFORMATION

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2. CONTACT - Indicate the name this report.	ne and telephone number of the owner or operator or other responsible official whom EPA may contact cond	cern
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6,2,8 3,5,0	AREA CODE	
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	CONTINUED	"!-
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10UP 1-18	20 21 NUMBER	:
OUP 1-18	W.A. Y.N.E	
	20 321 40 ZIP 44 80 STATE	<u>.</u>
	emissions from this source and cannot meet the emission limitations contained in the National Emission the affective date of any standards or amendments which require the submission of such information. Signature of Owner, Operator or Other Responsible Official	on
	Signature of Owner, Operator or Other Happosible Official	

NOTE: If the emissions from the source will exceed those limits set by the National Emission Standard for Hazardons Air Pollutants, the source will be in violation and subject to l'ederal enforcement actions unless granted a waiver of compliance by the Administrator of the U.S. Environmental Protection Agency. The information needed for such waivers is listed in Section II of this form.

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2. INACTIVATION - After the site is inactivated, indicate the method or methods used to comply with the standard and send a list of the actions that will be undertaken to maintain the inactivated site.	
PA Form 7800-1 (9-75)	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 1735 BALTIMORE KANSAS CITY, MISSOURI - 64108

February 5, 1976

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

GAF Corporation 9215 Riverview Drive St. Louis, Missouri 63137

Dear Sir:

Pursuant to Section 112 of the Clean Air Act, as amended (42 U. S. C. 1857 et seq), the Administrator of the United States Environmental Protection Agency promulgated National Emission Standards for Hazardous Air Pollutants. These emission standards are applicable to certain sources of asbestos, beryllium, and mercury emissions. We believe that your company may be such a source.

The purpose of this letter is to notify the owners or operators of affected sources of the requirements of the regulations. A copy of these regulations is included as Enclosure (1). The requirements include:

Prohibited Activities*

- 1. No person may construct any new source or modify any existing source to which a standard is applicable without first obtaining approval from EPA.
- 2. No person shall operate any new source in violation of any applicable standard.
- 3. No person shall operate any existing source in violation of any applicable standard, except under a waiver granted by the EPA Administrator.
- 4. No person shall fail to report or source test as required by these regulations.

*The President may exempt any source from compliance with the standards for a period of not more than two years (renewable) if he finds that the technology to implement such standards is not available and the operation of such source is required for reasons of national security. Inquiries regarding this exemption should be addressed to this office.

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Penalties

Any person who knowingly violates the requirements of the regulations shall be punished by a fine of not more than \$25,000 per day of violation or by imprisonment for not more than one year, or by both. If the conviction is for a violation committed after the first conviction, punishment shall be by a fine of not more than \$50,000 per day of violation, or by imprisonment for not more than two years, or by both.

Initial Source Reporting

Owners or operators of existing sources subject to the regulations <u>must</u> report certain information to this office on or before March 1, 1976. A standard form to be used for reporting is included as Enclosure (2).

Waivers of Compliance

Waivers of compliance from the standards may be requested by owners or operators of existing sources. EPA may allow a period of up to two years after the date of promulgation for the installation of necessary controls if such period is necessary for the installation of controls and if the health of persons will not be subject to imminent endangerment during the waiver period. EPA is unaware at this time of any present situations of imminent endangerment being created by existing sources of asbestos, mercury, and beryllium. For this reason Section IIA2.b. of the reporting form (Enclosure 2) need not be completed unless you are specifically advised to do so by this office. EPA will condition any waiver of compliance granted on the source taking those steps that EPA may in the future determine are necessary to assure that the health of persons will be protected from imminent endangerment.

Requests for waivers of compliance should be submitted by March 1, 1976, to be assured that action will be taken on the waiver request prior to April 1, 1976. Continued operation in excess of a standard without a waiver of compliance is a <u>violation</u> of the Clean Air Act, as amended. The standard form to be used for requesting a waiver of compliance is included as part of the reporting form, Enclosure (2).

Waivers of Source Testing

Source emission tests using test methods approved pursuant to 61.14(a) of the regulations are required before

March 1, 1976, for existing sources of beryllium and mercury and within 90 days after startup of new sources. You must notify this office at least 30 days in advance of the required test. Emission tests may be waived upon written application to EPA if, EPA determines that the source is meeting the standard, or if the source is operating under a waiver of compliance or has requested a waiver of compliance. Generally, an indirectly heated mercury extraction process (retort) producing less than 76 pounds/day of mercury (1 flask) or a directly heated mercury extraction process processing less than 20 tons/day of mercury ore will be considered to be meeting the standards. The standard form to be used for requesting a waiver of source testing is included as part of the reporting form, Enclosure (2).

If you do not own or operate an affected source as described in the regulations, would you please notify Mr. Earl J. Stephenson, Director, Division of Enforcement at this office. If you have questions concerning the regulations, do not hesitate to contact this office.

Sincerely yours,

Earl Jolysh

Earl J. Stephenson Director

Division of Enforcement

Enclosures

cc to Mr. G. Reed - GAF - ST. LOUIS
Mr. W. Neal - GAF - ST. LOUIS
Mr. G. Hemminghaus - GAF - ST. LOUIS

NATIONAL EMISSION STANDA FOR HAZARDOUS AIR POLLUTANTS COMPLIANCE STATUS INFORMATION

Form Approved
OMB No. 158-R0131

I. SOURCE REPORT

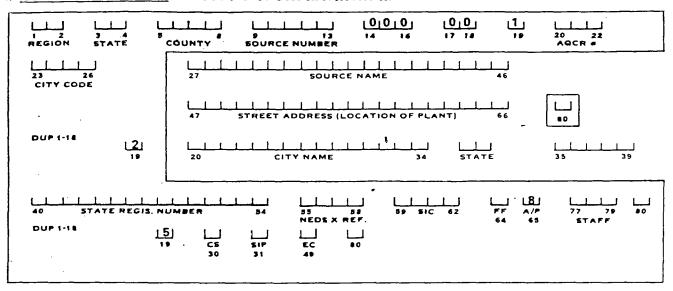
tNSTRUCTIONS: Owners or operators of sources of hazardous pollutants subject to the National Emission Standards for Hazardous Air Pollutants are required to submit the information contained in Section I to the appropriate U. S. Environmental Protection Agency Regional Office prior to 90 days after the effective date of any standards or amendments which require the submission of such information.

A listing of regional offices is provided in \$61.04.

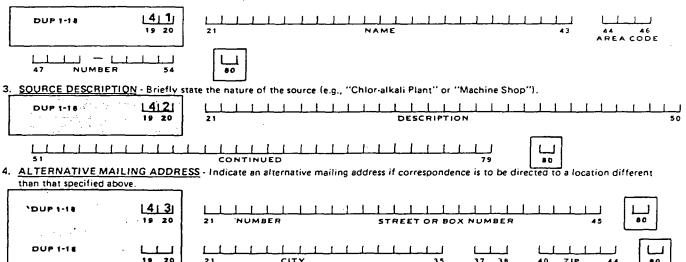
PLEASE NOTE: Do not write in shaded areas.

A. SOURCE INFORMATION

1. IDENTIFICATION/LOCATION - Indicate the name and address of each source.



2. <u>CONTACT</u> - Indicate the name and telephone number of the owner or operator or other responsible official whom EPA may contact concerning this report.



5. COMPLIANCE STATUS - The emissions from this source cannot meet the emission limitations contained in the National Emission Standards prior to 90 days after the effective date of any standards or amendments which require the submission of such information.

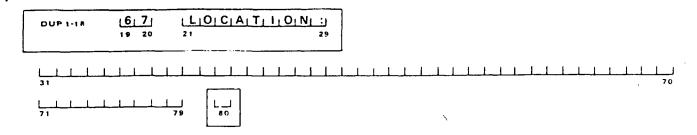
Signature of Owner, Operator or Other Responsible Official

NOTE: If the emissions from the source will exceed those limits set by the National Emission Standards for Hazardous Air Pollutants, the source will be in violation and subject to Federal enforcement actions unless granted a waiver of compliance by the Administrator of the U.S. Environmental Protection Agency. The information needed for such waivers is listed in Section II of this form.

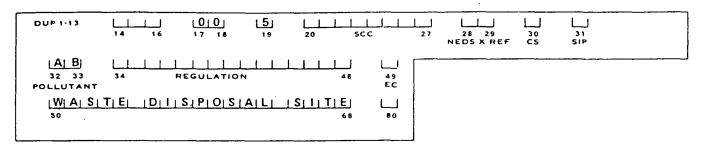
1. B. PROJESS INFORMATION. Part B should completed separately for each point of emission for azardous pollutant. [Sources subject to 61.22 (1) may omit number 4. below.]
DUP 1-13 [] [0 0] [5] [] [] [] [] [] [] [] []
1. POLLUTANT EMITTED - Indicate the type of hazardous pollutant emitted by the process. Indicate "AB" for asbestos, "BE" for beryllium, or "HG" for mercury.
32 33 POLLUTANY REGULATION 48 49 EC
2. PROCESS DESCRIPTION - Provide a brief description of each process (e.g., "hydrogen end box" in a mercury chlor-alkali plant, "grinding machine" in a beryllium machine shop). Use additional sheets if necessary.
50 PROCESS DESCRIPTION 74 80
DUP 1-18 1611
51 79 80
DUP 1-18
79 80
 AMOUNT OF POLLUTANT - Indicate the average weight of the hazardous material named in Item 1 which enters the process in pounds per month (based on the previous 12 months of operation).
DUP 1-18 [6] 3] 19 20 21 27 [L] B S / M O 29 36 80
 CONTROL DEVICES a. Indicate the type of pollution control devices, if any, used to reduce the emissions from the process (e.g., venturi scrubber, baghouse, wet cyclone) and the estimated percent of the pollutant which the device removes from the process gas stream.
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45 PRIMARY DEVICE NAME 64 66 FERCENT RE- MOVAL EFFICIENCY 60 12 79 60
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47 SECONDARY DEVICE NAME 64 66 70 72 79 80 PERCENT RE- MOVAL EFFICIENCY
b. Asbestos Emission Control Devices Onlyi. If a baghouse is specified in Item 4a, give the following information:
The air flow permeability in cubic feet per minute per square foot of fabric area.
Air flow permeability =cfm/ft ²
 The pressure drop in inches water gauge across the filter at which the baghouse is operated.
Operating pressure drop =inches w.g.
 If the baghouse material contains synthetic fill yarn, check whether this material is spun or not spun.

If the baghouse utilizes a felted fabric, give r im thickness in inches and the density in our regard.
Thickness =inches Density =oz/yd²
ii. If a wet collection device is specified in Item 4a, give the designed unit contacting energy in inches water gauge.
Unit contacting energy = inches w.g.
C. <u>DISPOSAL OF ASBESTOS-CONTAINING WASTES.</u> Part C should be completed separately for each asbestos-containing waste generation operation arising from sources subject to \$ 61.22 (al., (c), (e), and (h).
DUP 1-13
32 33 34 REGULATION 48 49 EC
 WASTE GENERATION - Provide a brief description of each process that generates asbestos-containing waste (e.g., disposal of control device wastes).
PROCESS DESCRIPTION 79 80 2. ASBESTOS CONCENTRATION - Indicate the average percentage asbestos content of waste materials.
DUP 1-18 [6 1] [A S B E S T O S C O N C E N T R A T 1 O N :] 19 20 21 45 48 50 80
3. AMOUNT OF WASTES - Indicate the average weight of asbestos-containing wastes disposed of, measured in kg/day.
DUP 1-18 [6:2] [K:G:/:D:A:Y: [: K:G:/:D:A:Y: [: C:/:D:A:Y: [: C:/:D:A:X:
4. CONTROL METHODS - Indicate the emission control methods used in all stages of waste disposal, from collection, processing, and packaging to transporting and disposition.
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5. WASTE DISPOSAL - Indicate the type of disposal site (sanitary landfill, open, covered) or incineration site (municipal, private) where the waste is disposed of and who operates the site (company, private, municipal). State the name and location of the site (closest city or town, county, state).
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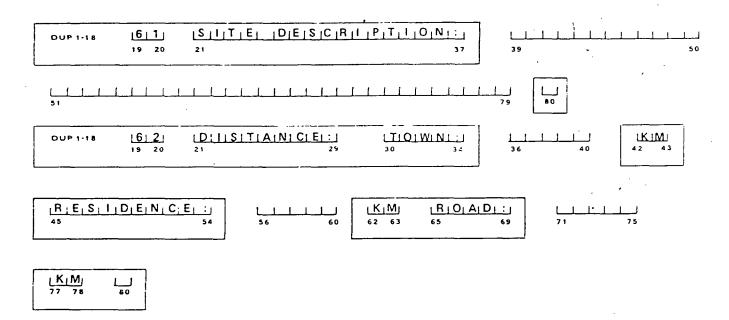
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D. WASTE DISPOSAL SITES. Part D should be completed separately for each asbestos waste disposal site subject to section 61.22 (I).



1. <u>DESCRIPTION</u> - Provide a brief description of the site, including its size and configuration, and the distance to the closest city or town, closest residence, and closest primary road.



2. INACTIVATION - After the site is inactivated, indicate the method or methods used to comply with the standard and send a list of the actions that will be undertaken to maintain the inactivated site.

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PART II - WAIVER REQUESTS

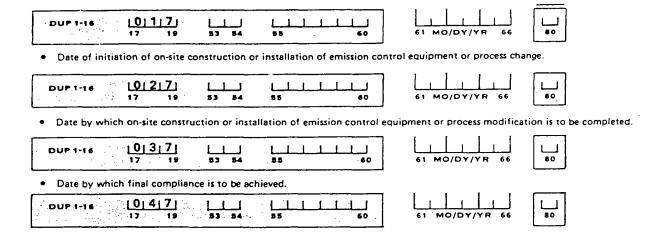
A. WAIVER OF COMPLIANCE. Owners or operators of sources unable to operate in compliance with the National Emission Standards for Hazardous Air Pollutants prior to 90 days after the effective date of any standards or amendments which require the submission of such information may request a waiver of compliance from the Administrator of the U.S. Environmental Protection Agency for the time period necessary to install appropriate control devices or make modifications to achieve compliance. The Administrator may grant a waiver of compliance with the standard for a period not exceeding two years from the effective date of the hazardous pollutant standard if he finds that such period is necessary for the installation of controls and that steps will be taken during the period of the waiver to assure that the health of persons will be protected from imminent endangerment.

The reporting information provided in Section I must accompany this application. Applications should be sent to the appropriate EPA regional office.

1. PROCESSES INVOLVED - Indicate the process or processes emitting hazardous pollutants to which emission controls are to be applied.

2. CONTROLS

- a. Describe the proposed type of control device to be added or modification to be made to the process to reduce the emissions of hazardous pollutants to an acceptable level. (Use additional sheets if necessary.)
- b. Describe the measures that will be taken during the waiver period to assure that the health of persons will be protected from imminer endangerment. (Use additional sheets if necessary.)
- 3. INCREMENTS OF PROGRESS Specify the dates by which the following increments of progress will be met.
- Date by which contracts for emission control systems or process modifications will be awarded; or date by which orders will be issued for the purchase of the component parts to accomplish emission control or process modification.



II. B. WAIVER OF EMISSION TESTS. A waiver of emission testing may be granted to owners or operators of sources of beryllium or mercury pollutants if, in the judgment of the Administrator of the U.S. Environmental Protection Agency the emissions from the source comply with the appropriate standard or if the owners or operators of the source have requested a waiver of compliance or have been granted a waiver of compliance.

This application should accompany the reporting information provided in Section I.

1. <u>REASON</u> - State the reasons for requesting a waiver of emission testing. If the reason stated is that the emissions from the source is within the prescribed limits, documentation of this condition must be attached.

SIGNATURE OF OWNER OR OPERATOR	DATE

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